

ECO or the Legal Department.

## *Business Courtesies*

- The specific rules and regulations that govern business courtesies for non-U.S. government entities differs from country to country, and violations can result in criminal liability under the U.S. Foreign Corrupt Practices Act. Business courtesies to government officials or representatives of non-U.S. countries or regional entities must be approved in advance and in writing by the Legal Department.

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**For further guidance** on business courtesies, refer to the Accepting Business Courtesy Policy and the Providing Business Courtesy Policy on Backyard at <http://backyard.yahoo.com/eco/policies.html>.

## Export, Import, and Anti-Boycott Laws

The U.S. export and import laws regulate where and with whom Yahoo! can do business and where we may transfer services, software, and other technologies. These laws also regulate the disclosure of technical information to non-U.S. nationals, including non-U.S. national Yahoo! employees, agents, and contractors located in the United States.

The U.S. export laws apply to exports delivered electronically via the Internet, email, or download, as well as to physical products. Remember, our ability to export products, services, and technologies is a privilege, not a right, and the U.S. government can revoke that privilege in the event of a violation. Failure to comply with the law can lead to a range of severe civil and criminal penalties for Yahoo! and individual employees, agents, and contractors, including fines, imprisonment, and revocation of the company's export privileges.

All Yahoo! employees, agents, and contractors must also adhere to the applicable customs and laws for importing products or technology. All commercial items arriving in a foreign country are subject to customs declarations whether the item is in your baggage, hand-carried, or shipped as freight.

Yahoo! is prohibited from participating in boycotts that are not sanctioned by the U.S. government – this includes (but is not limited to) agreements to discriminate, refusals to do business with certain countries or companies blacklisted by other governments, or letters of credit that require boycott-related acts. To ensure compliance with anti-boycott laws, always have the Legal Department review agreements, transactions, and letters of credit that contain potential boycott-related language.

## Export, Import, and Anti-Boycott Laws



### KNOW THE CODE

- Coordinate early with the Legal Department in the product planning and development process in order to comply with export and import laws as they relate to physical or electronic international transfer of controlled goods, services, software, or technology outside the United States.
- Remember that transactions with countries subject to U.S. trade embargo (currently Iran, Sudan, North Korea, Syria, and Cuba) are prohibited.
- Do not conduct business with parties listed on governmental trade exclusion lists, including (but not limited to) the U.S. Denied Persons, Entity, and Specially Designated Nationals List.
- Never release or disclose export-restricted software or technology to certain non-U.S. nationals without an export license.

- Do not engage in transactions with parties engaged in proliferation of weapons of mass destruction, including nuclear, missile, chemical, and biological weaponry activities.
- Comply with required declarations and customs regulations when you are engaged in Yahoo! business.
- Don't participate in or promote boycotts that the United States does not support.
- Notify the Legal Department of any boycott-related requests so that they may be reported to the U.S. government.

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**For further guidance** on export, import, and anti-boycott laws consult Export Compliance on Backyard at <http://backyard.yahoo.com/eco/export.html> or email [ExportCompliance@yahoo-inc.com](mailto:ExportCompliance@yahoo-inc.com).

## Money Laundering

Money laundering is an attempt by individuals or organizations to hide or disguise the proceeds of criminal activity through a series of otherwise legitimate business transactions. We review Yahoo! products and services before release to determine if any features could be susceptible to money laundering. Yahoo! forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion.



### KNOW THE CODE

- If you become aware of potential money laundering activities, immediately report your concerns to the Legal Department or to the ECO.

## Gathering Information About Competitors

It is entirely proper for us to gather information about our marketplace, including information about our competitors and their products and services. But we must always do it appropriately and in a manner that will not reflect adversely on Yahoo!. We should never use illegal or unethical means (such as by theft, spying, bribery, or in breach of a nondisclosure agreement) to obtain information. Remember, the improper gathering or use of competitive information could subject you and Yahoo! to criminal and civil liability. When in doubt as to whether your receipt or collection of information is proper, contact the Legal Department or [litcon@yahoo-inc.com](mailto:litcon@yahoo-inc.com).



### KNOW THE CODE

- Review public sources, such as websites, analyst reports, and business and marketing literature for information about competitors.
- Never attempt to obtain confidential information from competitors' current or former employees or from Yahoo! business partners, customers, or suppliers that do business with them.
- If there is any indication that competitive information you obtained was not lawfully received, refuse to accept it.
- If you receive any competitive information anonymously or marked "confidential," don't open or review it – contact the Legal Department immediately.

## Anti-Corruption Laws

As Yahoos, we conduct business honestly and fairly, and we don't provide or offer anything of value to **anyone** in exchange for a favorable decision or to secure favorable treatment.

Anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act (FCPA), prohibit the offering or payment of anything of value (including, but not limited to, money, stock, services, products, travel expenses, employment of related persons, and entertainment) to a foreign government official, political party, party official, or a candidate for political office in order to influence official acts, obtain or retain business, or secure any improper advantage. The FCPA also prohibits creating inaccurate or false books and records, and requires companies to have adequate controls regarding accounting and corporate assets. Before making any kind of payment or offering anything of value to a government official or official of any company or entity that may be directly or indirectly owned by the government, for any reason, you must consult with the ECO and obtain approval in advance, in writing.

Remember, you could be subject to criminal and civil penalties (including fines and imprisonment) for violating anti-corruption laws. Also, remember that Yahoo! can be held responsible for the conduct of our agents, contractors, and anyone else who is working on our behalf. Before hiring any third parties, make sure they are adequately screened for a prior history of – or a propensity to engage in – any corrupt activities. Once hired, make sure they comply with the law and with Yahoo!'s anti-corruption policies while engaged in activities on our behalf.

## Anti-Corruption Laws



### KNOW THE CODE

- Comply with anti-corruption laws and consult with the ECO or the Legal Department if you ever have questions or concerns.
- If you have any knowledge or suspicion of corrupt activity or have been asked to make an improper payment, report it immediately to the ECO or the Legal Department.
- If you are responsible for hiring or managing partners, agents, or other third parties to act on Yahoo!s behalf, exercise due diligence to ensure they:
  - Have no history of or propensity for engaging in corrupt activities
  - Are conducting Yahoo! business in accordance with our anti-corruption policies

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**For further guidance** on anti-corruption laws consult Anti-Corruption on Backyard at <http://backyard.yahoo.com/eco/anticorruption.html>.



## Q&A

**Q:** In working with one of Yahoo!'s joint venture partners, the partner offers you a bonus for going "above and beyond." Can you accept the bonus?

**A:** No. In situations like this, only Yahoo! should provide incentives to employees if the company feels they are due. Incentives to Yahoo! employees or contractors could create the perception of a conflict of interest and should not be provided by or accepted from third parties, even if they are close partners.

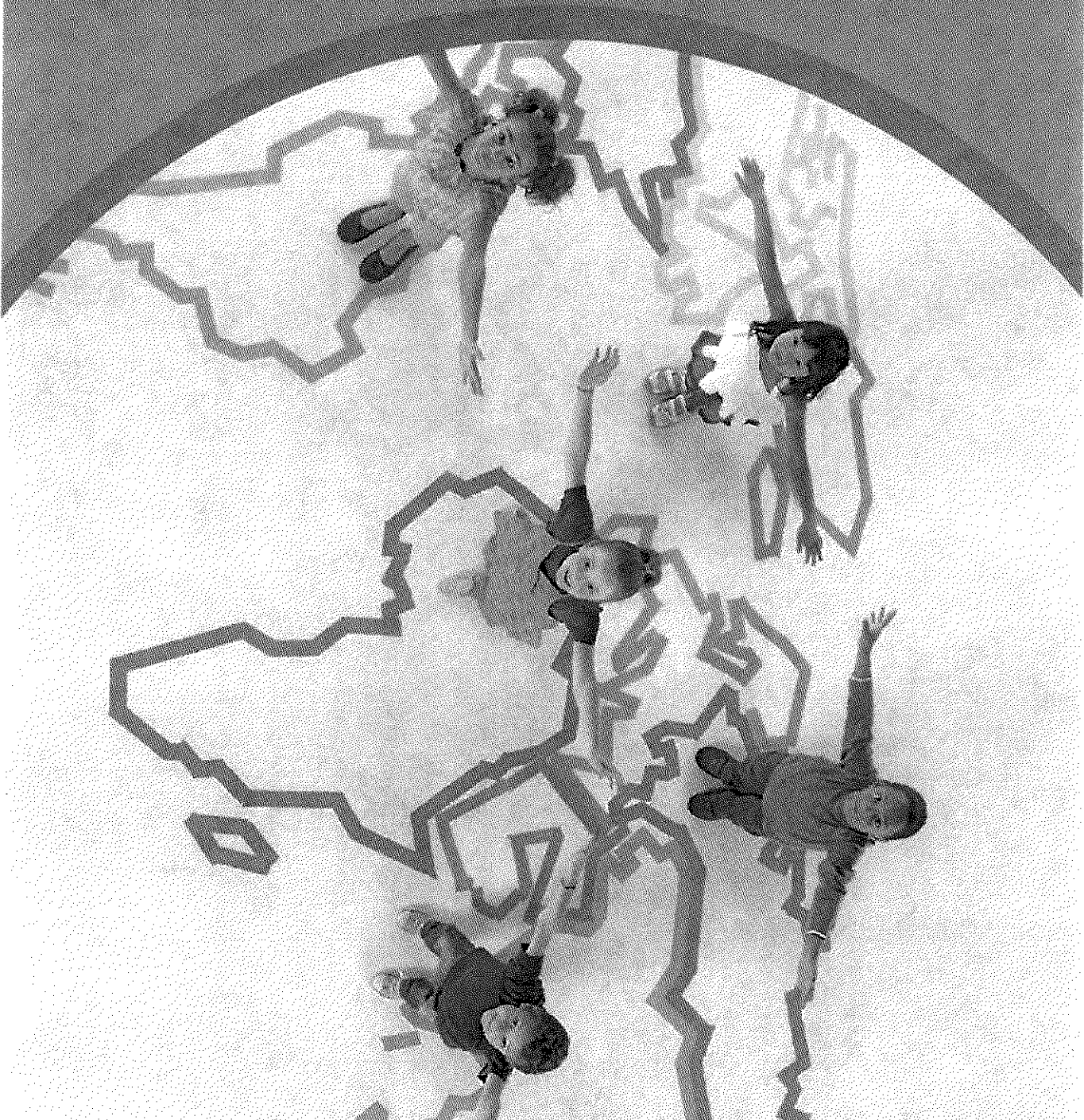
**Q:** An opportunity arises for Yahoo! to do business in another country, but a local official expects special fees and other compensation for the business. What do I do?

**A:** Certain payments, even if normal under local custom, could violate the U.S. FCPA. Before making any kind of payment or offering anything of value to a government official, for any reason, you must consult with the ECO and obtain approval in advance, in writing.



# Our Community

We strive  
to make our  
communities  
better places  
to live and work,  
everywhere we  
do business.





## User Privacy

Many of Yahoo! features and services require that we collect, process, and store personal information about our users. They trust us to protect their information and use and maintain it according to our published policies. Our Privacy Policy gives our users notice of what we collect, how it will be used, and with whom we will share it. It gives them choices about how we use their information and the opportunity to opt out of certain uses of their data, such as for commercial communications. It also gives them the ability to update and correct some of their registration information. Finally, it provides them with assurances that we take measures to protect the security of their personal information.



### KNOW THE CODE

- Respect our users' privacy and handle user data according to our Privacy Policy.
- Don't share Yahoo! user information with parties outside of Yahoo! unless approved by the Legal Department.
- Be aware that international properties may have additional privacy policy requirements – if you have a situation involving non-U.S. users, consult with the Legal Department.
- Personal information about Yahoo! users under the age of 13 is subject to special handling requirements – if you have a situation involving users under the age of 13, again, consult with the Legal Department.

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**For further guidance** on user privacy consult the Privacy Policy on Backyard at [http://backyard.yahoo.com/resources/humans/g2w\\_us/standards/confidential.html](http://backyard.yahoo.com/resources/humans/g2w_us/standards/confidential.html).